

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Jason E. Benson,
Plaintiff

v.

Thomas Duran, et al.,
Defendants

: CIVIL ACTION NO. 1:CV-00-1229
: (Judge Caldwell)
: (Magistrate Judge Blewitt) ✓

MOTION FOR LEAVE TO FILE AN AMENDED COMPLAINT

FILED
SCRANTON.

SEP 08 2000

PER
DEPUTY CLERK

Plaintiff Jason E. Benson, pursuant to Rules 15(a), 15(b), 15(d), and 19(a), Fed.R.Civ.P., requests leave to file an amended complaint, adding two (2) parties.

1.) The plaintiff, adds Dr. Ronald Long and Dr. William Ellien as defendants.

2.) Since the filing of the complaint, defendant has determined that Dr. Ronald Long and Dr. William Ellien both contributed directly and substantially to the life threatening seizures known as "Status Epilepticus" that plaintiff stated he suffered in his complaint.

3.) In demonstrating Dr. Long and Dr. Ellien's actions, plaintiff amends paragraph 1, 2, and 7 of the allegations, and adds paragraph 8, 9, 10, 11, and 12 to the allegations.

4.) Plaintiff amends paragraphs 2, 3, 4, A2, A3, and B3 of the relief requested. Plaintiff adds paragraph A5 and A6 to the claims for relief.

5.) To further demonstrate Dr. Ronald Long and Dr. William Ellien's actions, plaintiff removes Exhibit "B". Plaintiff adds Exhibts "F", "G", and "H" (1), (2).

6.) To conform to Rule 15(a), plaintiff adds sections titled "Preliminary Statements," "Jurisdiction," and "Parties."

August 28, 2000

Clerk of Courts
United States District Court for the
Middle District of Pennsylvania
Federal Building
Scranton, PA 18501

RE: Jason Eric Benson v. Thomas Duran, et al.
No. 1:00-CV-01229, Scranton

Dear Clerk:

Enclosed, please find Motion For Leave To File An Amended Complaint having been served on defendant's attorney's as demonstrated by Certificate of Service.

Kindly file on my behalf.

Your time and assistance is appreciated very much.

Very truly yours,



Jason Eric Benson, DS-6483
SCI Smithfield
P.O. Box 999
1120 Pike Street
Huntingdon, PA 16652

JB/
David L. Schwalm,
John R. Kantner
CC:

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FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Jason E. Benson, : CIVIL ACTION NO. 1:CV-00-1229
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: :

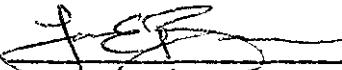
CERTIFICATE OF SERVICE

I, Jason Eric Benson, hereby certify that on this day I served a true and correct copy of foregoing Motion For Leave To File An Amended Complaint upon defendant's attorney(s) by first class mail, postage pre-paid, addressed as follows:

David L. Schwalm, Esquire
Attorney I.D. # 32574
305 North Front Street
P.O. Box 999
Harrisburg, PA 17108-0999

Respectfully,

Date: 08/29/00



Jason Eric Benson, DS-6483
SCI Smithfield
P.O. Box 999
1120 Pike Street
Huntingdon, PA 16652